

ecology and environment, inc.

International Specialists in the Environment

2101 Fourth Avenue, Suite 1900, Seattle, WA 98121 Tel: (206) 624-9537, Fax: (206) 621-9832

RECEIVED

OCT 07 2003

Environmental Cleanup Office

September 29, 2003

Mrs. Sharon Nickels, Project Officer United States Environmental Protection Agency 1200 Sixth Avenue, ECL-116 Seattle, Washington 98101

Re: Contract No. 68-S0-01-01; Technical Directive Document No. 03-08-0009; Shades of Seattle Final

Disposal Letter Report

Dear Mrs. Nickels:

Please find the enclosed Letter Report for the final disposal of the Shades of Seattle waste originally dumped at 2900 NE Blakeley Street, Seattle, Washington.

If you have any further questions or comments, please contact me at (206) 624-9537.

Sincerely,

Jeffrey Fowlow

START-2 Project Leader

Enclosure

cc: Jeffry Rodin, On-Scene Coordinator, EPA Region 10, Seattle, WA

Bruce Mirkin, Special Agent, Criminal Investigation Division, EPA Region 10, Seattle, WA

Steven Merritt, Project Manager, E & E, Seattle, WA

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Mrs. Sharon Nickels, Project Officer United States Environmental Protection Agency 1200 Sixth Avenue, ECL-116 Seattle, Washington 98101

Re: Contract No. 68-S0-01-01; Technical Directive Document No. 03-08-0009; Shades of Seattle Final Disposal Letter Report

Dear Mrs. Nickels:

This letter has been developed pursuant to Technical Directive Document (TDD) Number 03-08-0009, Shades of Seattle Final Disposal, and addresses activities conducted between August 21, 2003 and September 29, 2003 under this TDD.

On August 21, 2003, the United States Environmental Protection Agency (EPA) tasked the Ecology and Environment, Inc., Superfund Technical Assessment and Response Team (START-2) to conduct sampling, documentation, and disposal of the remaining Shades of Seattle waste being stored in a custody locker at the START-2 warehouse. The waste consisted of 24 five-gallon containers of flammable solvents that were recovered from a dump site at 2900 NE Blakeley Street, Seattle, Washington in September 1999. This site, referred to as the University Village Drum Site, was documented under TDD 02-09-0007 as part of the Shades of Seattle criminal investigation. The EPA Region 10 Criminal Investigation Division (CID) requested that the evidence removed from this site be held in custody at the START-2 warehouse until further notice. This TDD serves as notice and requires START-2 to collect and document two 4-ounce samples from each of the 24 containers, to transfer custody of the samples to CID, and to dispose of the remaining waste solvent and containers at a Resource Conservation and Recovery Act licensed facility.

On September 3, START-2 contacted Jeffry Rodin, the EPA On-Scene Coordinator during the original response to the University Village Drum Site, and Bruce Mirkin, the CID Special Agent in charge of this case, to coordinate the sampling event on September 13, 2003. On September 13, 2003, START-2 contractors Steven Merritt and Renee Nordeen conducted the sampling and documentation of the waste

material from the 24 containers at the START-2 warehouse. Photographic documentation is provided in Attachment A. The samples were collected using one glass drum thief per container to transfer the liquid contents into two 4-ounce sample jars. Each container and its corresponding set of samples were photographed after labels, packaging tape, and custody seals had been applied to the sample jars. The sample set was placed in a protective bubble wrap bag and photographed again to illustrate how the item was packaged for transfer to CID. The packaged sample sets from all 24 containers were collected and placed together in a large plastic bag, which was wrapped with packaging tape and custody sealed. This bag was placed in a cooler with the samples from the other Shades of Seattle sites, a 40-mL distilled water trip blank, and the completed the chains of custody (Attachment B). Special Agent Bruce Mirkin was unable to attend the sampling event, but the cooler was delivered to him on September 24, 2003. He took custody of samples and placed them into storage in the EPA Region 10 CID evidence locker on September 26, 2003.

Shortly after receiving this TDD, START-2 requested bids for the disposal of approximately 120-gallons of paint-related waste from Onyx Environmental Services, Philips Services Corporation (PSC), Prime Environmental Services, Safety Kleen Systems, and Emerald Services Northwest. Bids arrived by September 17, 2003 from Onyx Environmental Services, PSC, and Prime Environmental Services. The subcontract was awarded to PSC. START-2 developed a profile for the wastes based upon the MSDS (Attachment C) for the Rodda 461 Lacquer Thinner and contacted the Washington Department of Ecology to get a RCRA ID number for the University Village Drum Site (Attachment D). Once the RCRA ID was issued and the profile was accepted by PSC, START-2 bulked the remaining wastes from the 24 containers into two 55-gallon steel drums. Any residual liquid in the original containers was allowed to evaporate and the empty containers were disposed of as solid waste using a solid waste disposal service. PSC manifested and transported the waste drums to their treatment facility in Kent, WA on September 29, 2003 (Attachment E).

If you have any questions pertaining to this letter, please feel free to contact me at (206) 624-9537.

Sincerely,

cc:

Ecology and Environment, Inc.

Jeffrey Fowlow, P.G.

START Project Leader

Dhroov Shivjiani, START-2 Program Manager, E&E, Seattle, WA Steven Merritt, START-2 Project Manager, E&E, Seattle, WA

ATTACHMENT A PHOTOGRAPHIC DOCUMENTATION

PHOTOGRAPH IDENTIFICATION SHEET 1

Camera Serial No.: 183511905 TDD No.: 03-8-0009
Lens Type: Olympus C700 Digital Site Name: Shades of Seattle Final Disposal

<u> </u>		-	7 00 2 1g10m1	
Photo	Photo Date By 1-01 9/12/03 SM		Direction	Description
1-01	9/12/03	SM	Е	Product drums set for sampling event at warehouse.
1-02	9/12/03	JF	E	SM & RN collecting samples from product container 09019.
1-03	9/12/03	JF	Е	SM & RN sealing sample jars and wiping down the outside of the jars.
1-04	9/12/03	SM	E	Product drums and samples at completion of sampling event.
1-05	9/12/03	JF	Е	SM & RN working to collect additional sample from container 09003.
09000A	9/12/03	SM	DOWN	09000 - Distilled water trip blank labeled and custody sealed.
09000B	9/12/03	SM	DOWN	09000 - Trip blank packaged in bubble wrap bag.
09001A	9/12/03	SM	DOWN	09001 - Product container and samples labeled and custody sealed.
09001B	9/12/03	SM	DOWN	09001 - Samples packaged in bubble wrap bag on product container.
09002A	9/12/03	SM	DOWN	09002 - Product container and samples labeled and custody sealed.
09002B	9/12/03	SM	DOWN	09002 - Samples packaged in bubble wrap bag on product container.
09003A	9/12/03	SM	DOWN	09003 - Product container and samples labeled and custody sealed.
09003B	9/12/03	SM	DOWN	09003 - Samples packaged in bubble wrap bag on product container.
09004A	9/12/03	SM	DOWN	09004 - Product container and samples labeled and custody sealed.
09004B	9/12/03	SM	DOWN	09004 - Samples packaged in bubble wrap bag on product container.
09005A	9/12/03	SM	DOWN	09005 - Product container and samples labeled and custody sealed.
09005B	9/12/03	SM	DOWN	09005 - Samples packaged in bubble wrap bag on product container.
09006A	9/12/03	SM	DOWN	09006 - Product container and samples labeled and custody sealed.
09006B	9/12/03	SM	DOWN	09006 - Samples packaged in bubble wrap bag on product container.
09007A	9/12/03	SM	DOWN	09007 - Product container and samples labeled and custody sealed.
09007B	9/12/03	SM	DOWN	09007 - Samples packaged in bubble wrap bag on product container.
09008A	9/12/03	SM	DOWN	09008 - Product container and samples labeled and custody sealed.
09008B	9/12/03	SM	DOWN	09008 - Samples packaged in bubble wrap bag on product container.
09009A	9/12/03	SM	DOWN	09009 - Product container and samples labeled and custody sealed.
09009B	9/12/03	SM	DOWN	09009 - Samples packaged in bubble wrap bag on product container.
09010A	9/12/03	SM	DOWN	09010 - Product container and samples labeled and custody sealed.
09010B	9/12/03	SM	DOWN	09010 - Samples packaged in bubble wrap bag on product container.
09011A	9/12/03	SM	DOWN	09011 - Product container and samples labeled and custody sealed.
09011B	9/12/03	SM	DOWN	09011 - Samples packaged in bubble wrap bag on product container.
09012A	9/12/03	SM	DOWN	09012 - Product container and samples labeled and custody sealed.
09012B	9/12/03	SM	DOWN	09012 - Samples packaged in bubble wrap bag on product container.

SM

=Steven Merritt

RN

=Renee Nordeen =Jeffrey Fowlow

PHOTOGRAPH IDENTIFICATION SHEET 2

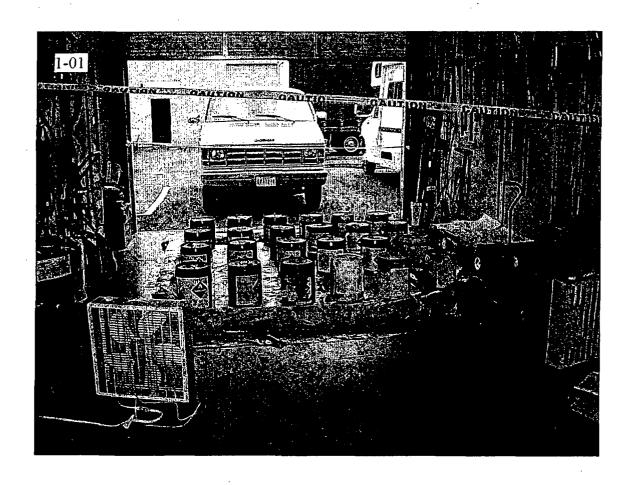
Camera Serial No.: 183511905 TDD No.: 03-8-0009 Lens Type: Olympus C700 Digital Site Name: Shades of Seattle Final Disposal

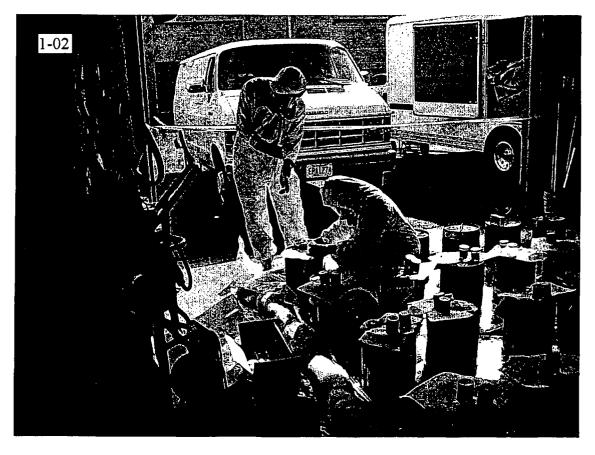
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Photo	Date	Ву	Direction	Description
09013A	9/12/03	SM	DOWN	09013 - Product container and samples labeled and custody sealed.
09013B	9/12/03	SM	DOWN	09013 - Samples packaged in bubble wrap bag on product container.
09014A	9/12/03	SM	DOWN	09014 - Product container and samples labeled and custody sealed.
09014B	9/12/03	SM	DOWN	09014 - Samples packaged in bubble wrap bag on product container.
09015A	9/12/03	SM	DOWN	09015 - Product container and samples labeled and custody sealed.
09015B	9/12/03	SM	DOWN	09015 - Samples packaged in bubble wrap bag on product container.
09016A	9/12/03	SM	DOWN	09016 - Product container and samples labeled and custody sealed.
09016B	9/12/03	SM	DOWN	09016 - Samples packaged in bubble wrap bag on product container.
09017A	9/12/03	SM	DOWN	09017 - Product container and samples labeled and custody sealed.
09017B	9/12/03	SM	DOWN	09017 - Samples packaged in bubble wrap bag on product container.
09018A	9/12/03	SM	DOWN	09018 - Product container and samples labeled and custody sealed.
09018B	9/12/03	SM	DOWN	09018 - Samples packaged in bubble wrap bag on product container.
09019A	9/12/03	SM	DOWN	09019 - Product container and samples labeled and custody sealed.
09019B	9/12/03	SM	DOWN	09019 - Samples packaged in bubble wrap bag on product container.
09020A	9/12/03	SM	DOWN	09020 - Product container and samples labeled and custody sealed.
09020B	9/12/03	SM	DOWN	09020 - Samples packaged in bubble wrap bag on product container.
09021A	9/12/03	SM	DOWN	09021 - Product container and samples labeled and custody sealed.
09021B	9/12/03	SM	DOWN	09021 - Samples packaged in bubble wrap bag on product container.
09022A	9/12/03	SM	DOWN	09022 - Product container and samples labeled and custody sealed.
09022B	9/12/03	SM	DOWN	09022 - Samples packaged in bubble wrap bag on product container.
09023A	9/12/03	SM	DOWN	09023 - Product container and samples labeled and custody sealed.
09023B	9/12/03	SM	DOWN	09023 - Samples packaged in bubble wrap bag on product container.
09024A	9/12/03	SM	DOWN	09024 - Product container and samples labeled and custody sealed.
09024B	9/12/03	SM	DOWN	09024 - Samples packaged in bubble wrap bag on product container.
1-06	9/12/03	SM	S	Custody sample storage locker with drums and sample coolers.
1-07	9/12/03	SM	S	Custody sample storage, locker sealed and locked.
2-01	9/24/03	JF	S	SM bulking product into 55-gallon drums.
2-02 .	9/24/03	SM	S	Product bulking operations area.
2-03	9/24/03	SM	W	Dried and emptied product containers disposed of as solid waste.
2-04	9/24/03	SM	N	Bulk product drums labeled and placarded; ready for transportation.
2-05	9/24/03	SM	· N	Drum 1 labeling.
2-06	9/24/03	SM	N	Drum 2 labeling.

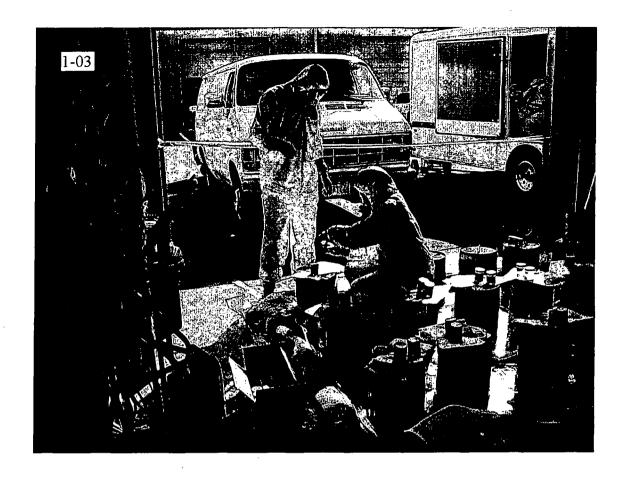
=Steven Merritt =Renee Nordeen

RN JF

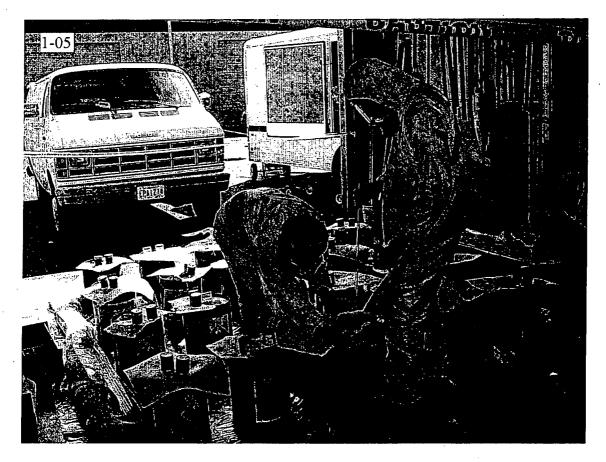
=Jeffrey Fowlow



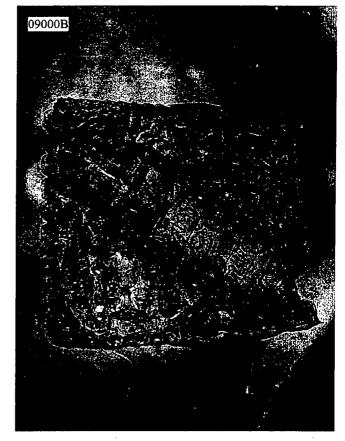


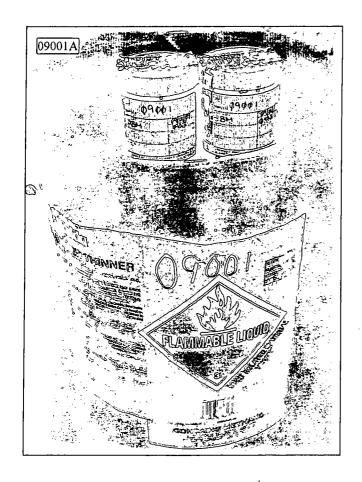


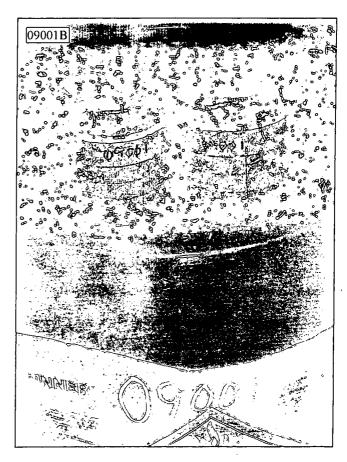




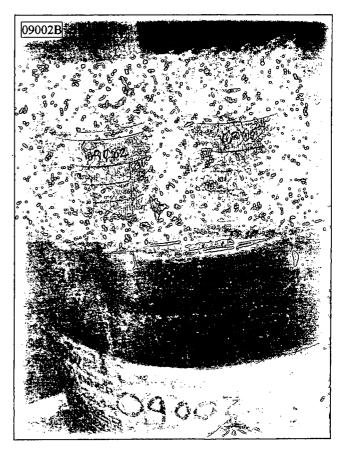


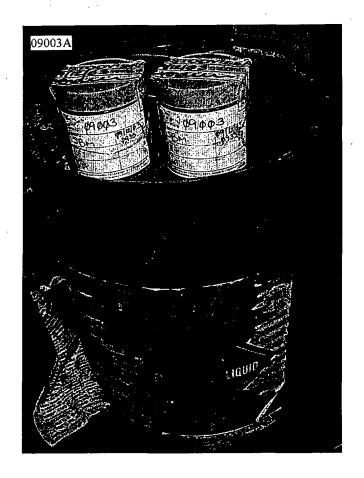


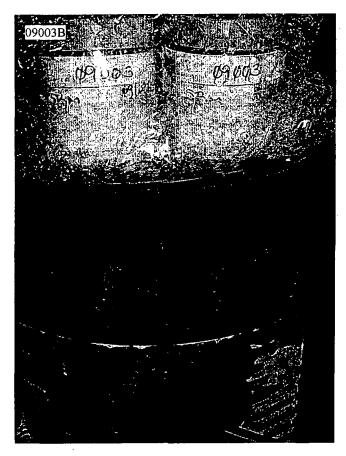


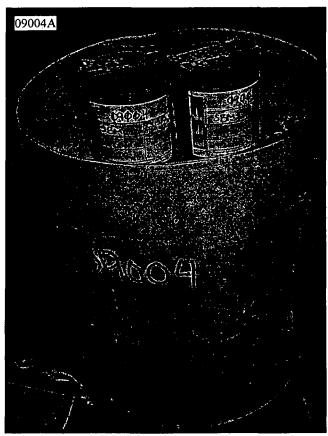




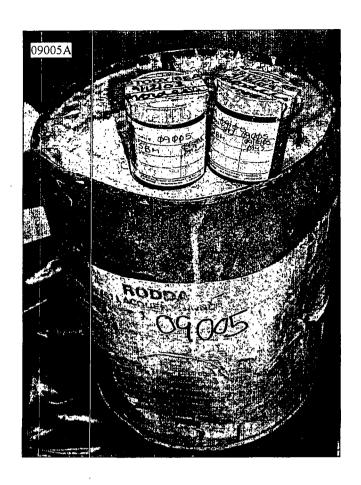


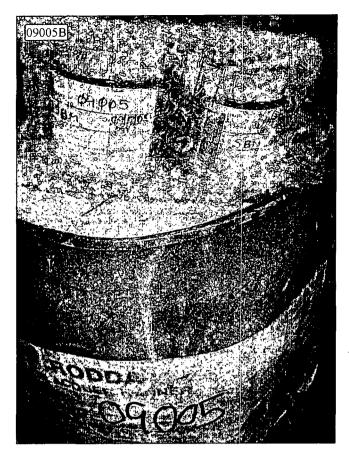




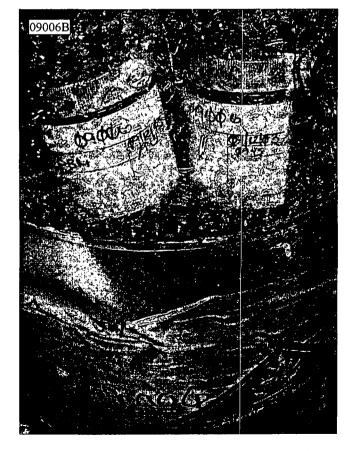


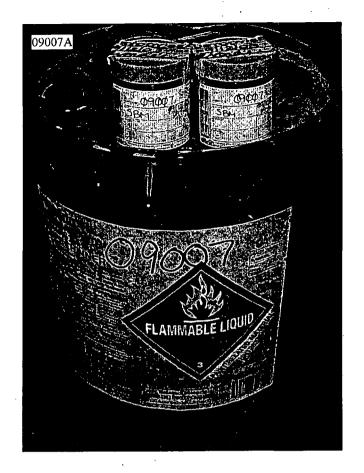


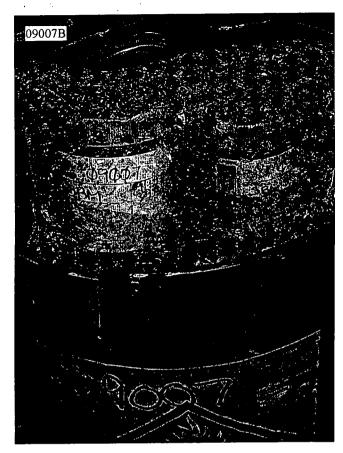


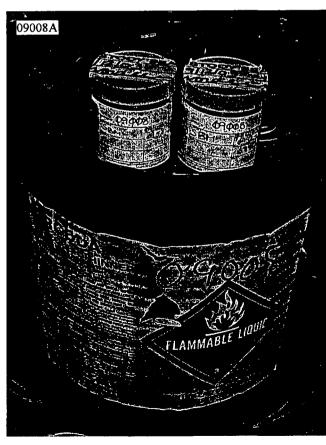


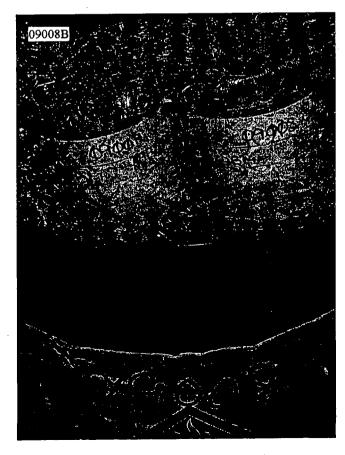


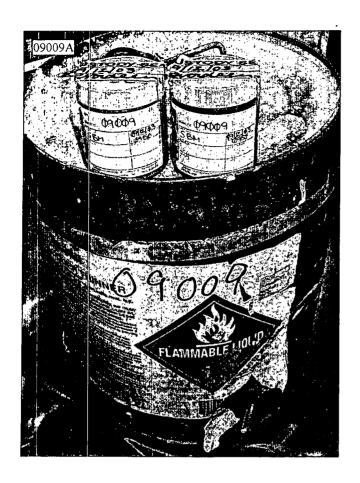


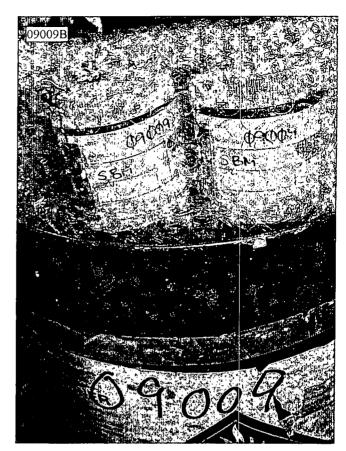


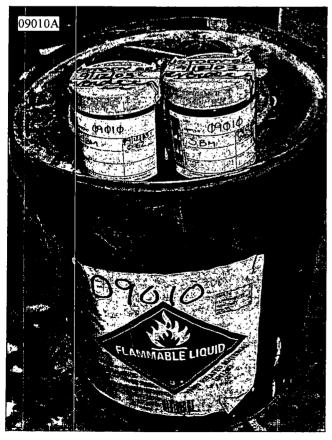


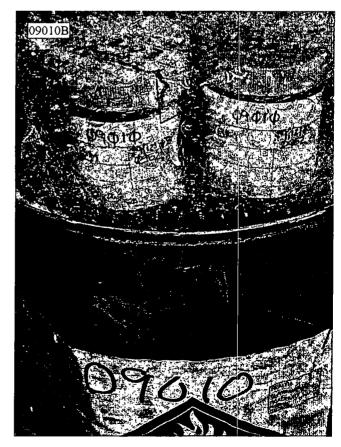


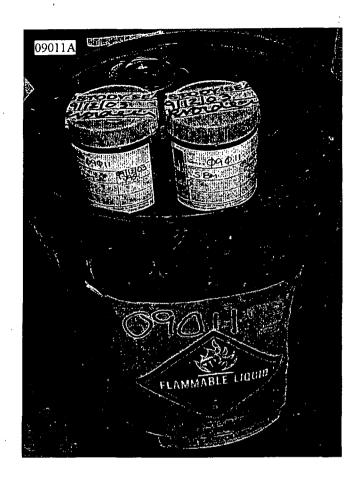


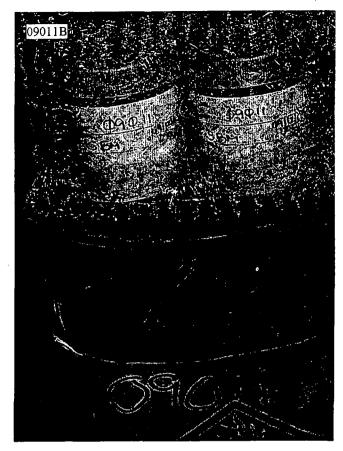


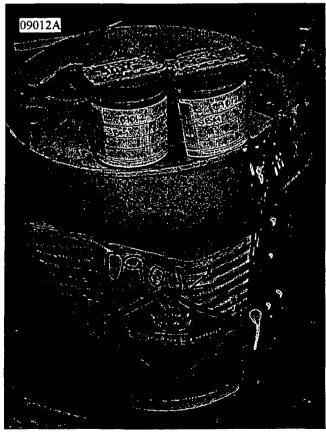


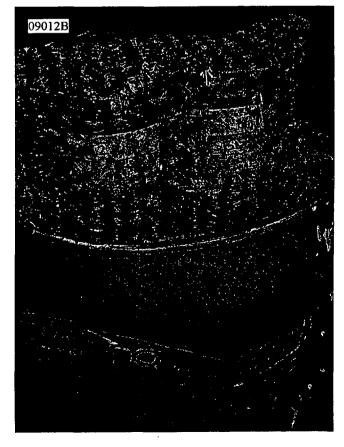




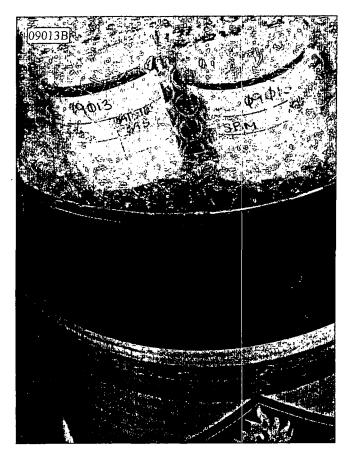




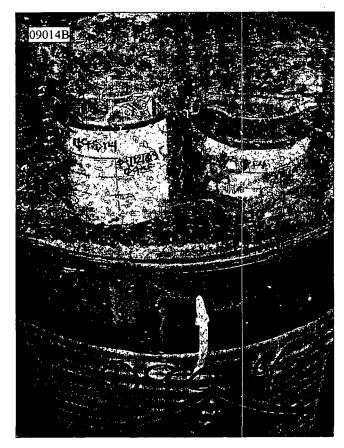




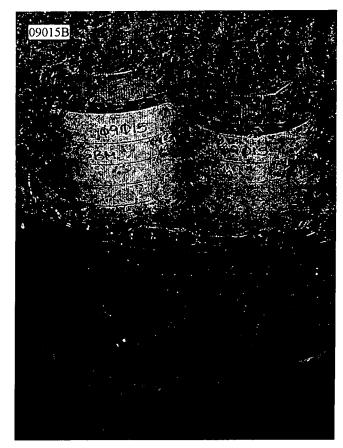




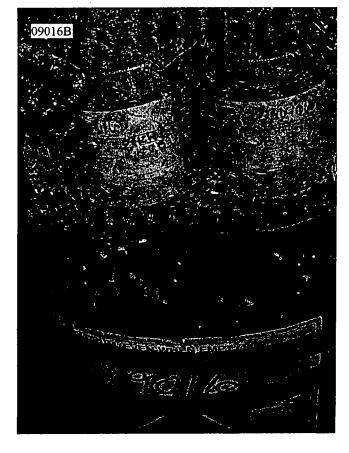




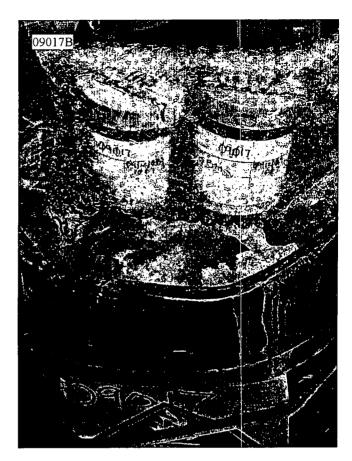




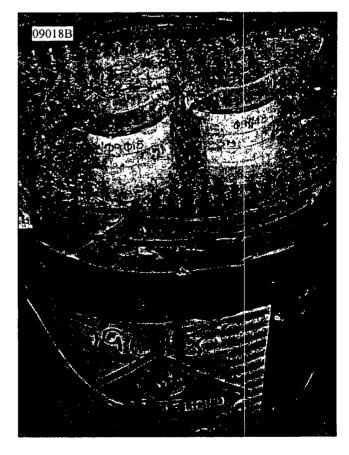


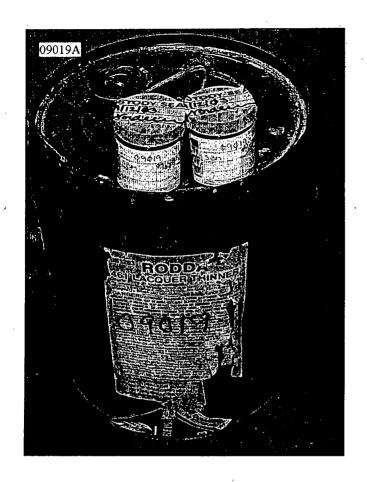


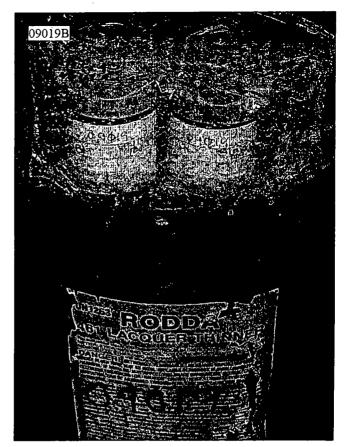


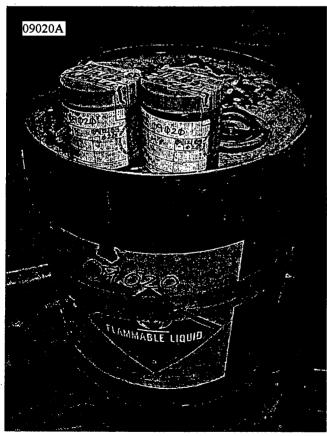


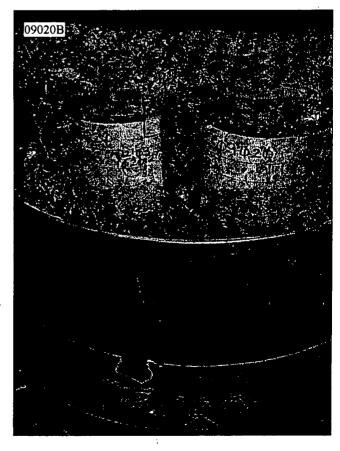




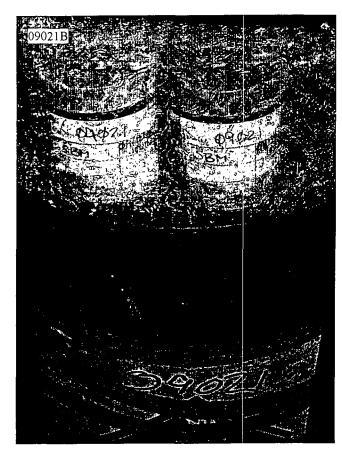


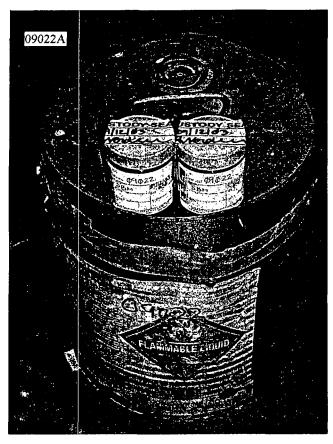




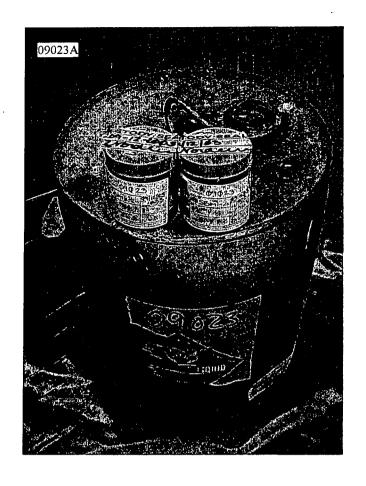


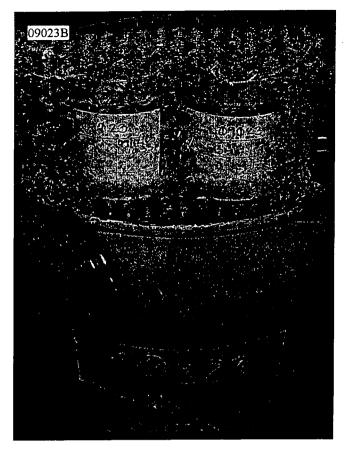


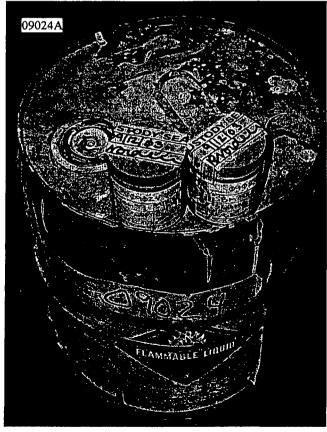


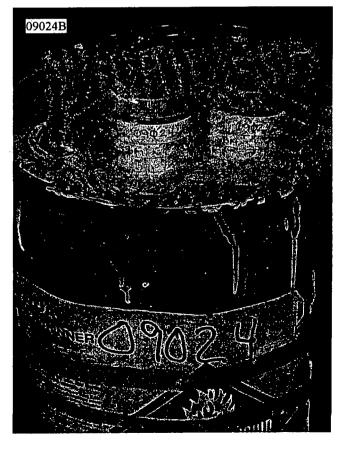


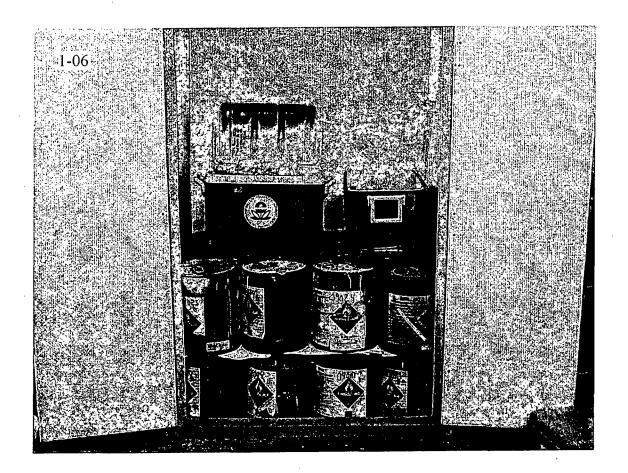


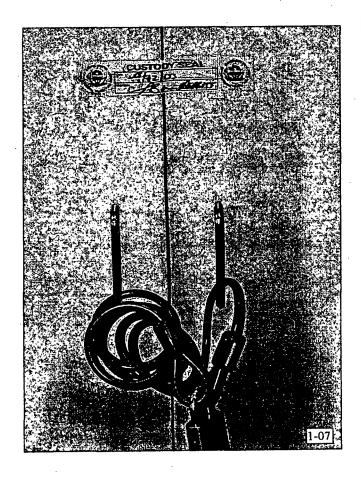










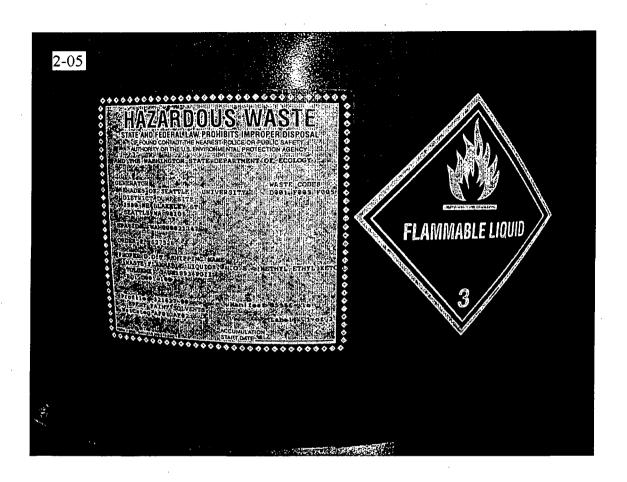


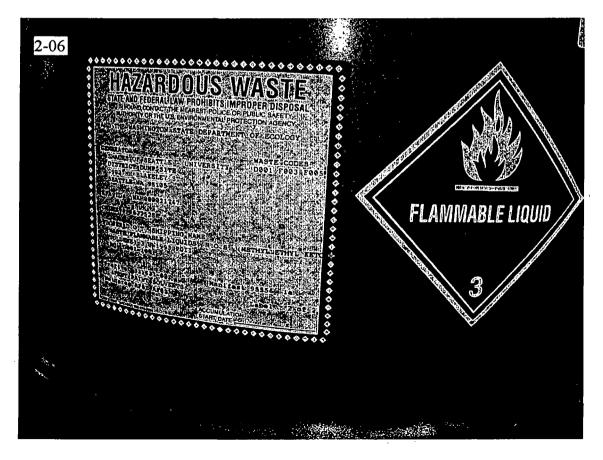












ATTACHMENT B SHADES OF SEATTLE CHAINS OF CUSTODY

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ATTACHMENT C SHADES OF SEATTLE WASTE PROFILE AND MSDS

Philip Services, Corporation

Page

Status: PENDING

Generator's Waste Profile 321627-00

Sales Rep 955 Jennifer Goltz

Starts : 23 SEP 2003 Expires: 30 SEP 2004

Acct Mngr 035 Brenda Smithson

A: GENERATOR (49644) SITE INFORMATION

B: CUSTOMER (19460) INFORMATION

SHADES OF SEATTLE - UNIVERSITY DISTRICT DUMP

EPA WAH000021747 **ECOLOGY & ENVIRONMENT - WA**

2900 NE BLAKELEY ST SEATTLE, WA 98105

9999 SIC

2101 4TH AVE. #1900

Contact JEFFREY RODIN

SEATTLE, WA 98121

Phone (206) 553-6709

C: WASTE INFORMATION

On File > MSDS Yes Analysis No

Sample No

Waste Name

SPENT PAINT SOLVENTS

Process

EPAICLEANUP SITE AT FORMER PAINT CONTRACTOR SITE JUSED FOR AS THINNERS AND EQUIPMENT CLEANING

Process	EPA CL	EANUP :	SHEAL	FORM	MER PAINT C	ON	RACTOR	SITE. USE	D FUR AS	IHIN	NEKS AND	CU	JIPME	11 CLEA	ANING		
D: PHYSICAL C	HARAC	TERIST	CS OF	WAS	TE							PH R	lange	4.1-10			
Phys States	L-Llq G-Siu	Top Co Mid Co Bot Co		RIES			Odor Layers Spec G	Stron Bi-Lay rav 0.8-1.	•	NT		Flasi	•	80-100 MSDS <73F	%		
E: CHEMICAL C	COMPOS	SITION	F WAS	TE			Informa	tion Provid	led By	enera	tor			(·***	
NAPHTHA ETHANOL METHYL ETHYL TOLUENE XYLENE PCB'S NP	•	E yanides	ΝP		(30 - (10 - (10 - (10 - (0 - Phenolics	2			ZENE	•			(0 0 0	- :	10 % 10 % 10 %	5
F: METALS ME		•			Cadmium	<1		Chromiun		· ·	ver	<5		Zinc			-
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G: OTHER CHA	RACTE	RISTICS	OF WA	STE				(2.744.1					-		···············		
lgn. Solid	No O	xidizer	No		Explosive	No	Shock	Sensitive	No	Wat	er Reactiv	18	No	Reactiv	ve		No
H: EPA / STATE Form W209 EPA Codes	Source		Origin		Dangerous SubPart CC			Yes APS No	DW / EHV		i	CA bris	No No	Univer Waste	sal Wa Water		No No
State Codes																	
I: SHIPPING IN	FORMA	TION		Marin	ne Pollutant	No	Dange	erous Wet	No	Inh	iation Ha	zard	No	Poisor	1		No
Containers	DM Me	tal Drum					Qty to	Ship Now	2X55G		Projecte	ed Vo	lume	1/Oneti	ime		
DOT Descrip	WASTE	FLAMM	ABLE LIC	SOIUE	S. N.O.S. (ME	THY	L ETHYL	KETONE, 1	FOLUENE)	3 UN'	993 PGII	RQ(E	0001=10)0) ERG	(128)		

J: SPECIAL HANDLING INFORMATION

GENERATOR CERTIFICATION

I hereby certify, as an authorized representative of the Generator named above, that BEI has been fully informed of all information known about this waste, including but not limited to, the waste's generation process, composition, and physical characteristics, necessary to identify proper treatment and disposal of waste and this information is true and accurate.

If this is an existing profile which is being renewed, I hereby certify that there have been no changes in this waste, chemical, physical, or regulatory designation since full characterization by sample testing.

This profile has a greater than 500 ppm volatile organic compounds and is subject to Subpart CC of the RCRA regulations.

STEVEN MELLETT ENVIRONMENTAL 924/03
Printed Name

Title

Philip maintains the requisite permits and agrees to accept this waste stream, as described.

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: LACQUER THINNER HMIS CODES: H F R P PRODUCT CODE: 799461 2 3 0 H

======= SECTION I - MANUFACTURER IDENTIFICATION ==========

MANUFACTURER'S NAME: RODDA PAINT COMPANY
ADDRESS: 6123 N MARINE DRIVE

OSHA TWA- 100ppm 435mg/m3

PORTLAND, OR 97203

EMERGENCY PHONE : (800) 424-9300 DATE PRINTED : 09/15/03 INFORMATION PHONE : (503) 737-6000 NAME OF PREPARER : Rick Barnard

=== SECTION II - HAZARDOUS INGREDIENTS/SARA III INFORMATION ====

REPORTABLE COMPONENTS		VAPOR PRESS		
	8032-32-4	5.0	25C	30 - 40
OSHA TLV- 300ppm STEL-				
NIOSH TWA- 350mg/m3 Ce		(value bas	sed on 15	5 minutes)
ACGIH TWA- 300ppm 1370				
ETHANOL	64-17-5			10 - 20
ACGIH: TLV(1000PPM) *# METHYL ETHYL KETONE OSHA TWA- 200ppm 590mg	OSH	A: PEL(100	OPPM)	
*# METHYL ETHYL KETONE	78 - 93-3	74.9	20C	10 - 20
OSHA TWA- 200ppm 590mg	/m3			
NIOSH TWA- 200ppm 590m				
ACGIH TWA- 200ppm 590mg				
*># TOLUENE	108-88-3			10 - 20
OSHA TWA- 200ppm Ceili				
peak above the acceptal	ble ceiling cond	entraction	for an 8	B-hour shift:
500ppm/10 minutes)				
NIOSH TWA- 100ppm 375mg		m 560mg/m3		
ACGIH TWA- 50ppm 188mg				
*# XYLENE	1330-20-7	5.1	20 C	0 - 10
OSHA TWA- 100ppm 435mg				
NIOSH TWA- 100ppm 435mg				
ACGIH TWA- 100ppm 434mg				
#>* GLYCOL ETHER		0.88	25C	0 - 10
OSHA TWA- 50ppm 240mg/r				
NIOSH TWA- 5ppm 24mg/m3				
ACGIH TWA- 25ppm 121mg				
*# METHANOL	67-56-1	97.68	20C	0 - 10
OSHA TWA- 200ppm 260mg				
NIOSH TWA- 200ppm 260mg				•
ACGIH TWA- 200ppm 262mg				
ACETONE	67-64-1	181.7	20C	0 - 10
OSHA TWA- 1000ppm 2400n				
NIOSH TWA- 250ppm 590mg				
ACGIH TWA- 500ppm 1188m				
	67-63-0	33	20C	0 - 10
OSHA TWA- 400ppm 980mg/				
NIOSH TWA- 400ppm 980mg				
ACHIG TWA- 400ppm 983mg				0 10
+*# ETHYLBENZENE	100-41-4	10	20 C	0 - 10

NIOSH TWA- 100ppm 435mg/m3 STEL- 125ppm 545mg/m3 ACGIH TWA- 100ppm 434mg/m3 STEL- 125ppm 543mg/m3

- * Indicates toxic material(s) subject to the reporting requirements of Section 313 of Title III and of 40 CFR 372.
- + Indictates material(s) listed as a NTP, IARC, or OSHA carcinogen. The above chemical(s) meet the criteria as defined under 29 CFR 1910 for toxic and hazardous substances.
- > Indicates material(s) listed on California's Proposition 65 known to the state to cause reproductive toxicity or cancer.
- # Indicates materials listed in Section 112(b) of the Clean Air Act.

====== SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS ======

BOILING RANGE: 133F - 336F SPECIFIC GRAVITY (H2O=1): 0.81

VAPOR DENSITY: Heavier than air. EVAPORATION RATE: Slower than Butyl Acetate.

COATING V.O.C.: 6.73 lb/gl MATERIAL V.O.C.: 6.46 lb/gl

SOLUBILITY IN WATER: None

APPEARANCE AND ODOR: Clear liquid, strong solvent odor.

====== SECTION IV - FIRE AND EXPLOSION HAZARD DATA =======

FLASH POINT: -1.0F METHOD USED: TCC

FLAMMABLE LIMITS IN AIR BY VOLUME- LOWER: 0.9 UPPER: 12.8

EXTINGUISHING MEDIA: CO2, dry chemical, foam, or water fog.

SPECIAL FIREFIGHTING PROCEDURES:

For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment. Self-contained breathing apparatus with a full facepiece operated in pressure-demand or other positive pressure mode to protect against the hazardous effects of normal products of combustion or oxygen deficiency.

UNUSUAL FIRE AND EXPLOSION HAZARDS:

Vapors are heavier than air and may travel along the ground or be moved by ventilation and ignited by heat, pilot lights, other flames and ignition sources at locations distant from material handling point. Never use welding or cutting torch on or near drum (even empty) because product (just residue) can ignite EXPLOSIVELY! Thermal decomposition of this product will produce carbon monoxide and carbon dioxide.

STABILITY: | X | Stable | Unstable

CONDITIONS TO AVOID

Excessive temperatures. Avoid all heat sparks and sources of ignition.

INCOMPATIBILITY (MATERIALS TO AVOID)

Strong oxidizing agents, strong alkalies, heat.

HAZARDOUS DECOMPOSITION OR BYPRODUCTS

Normal combustion forms carbon dioxide and water vapor; incomplete combustion can produce carbon monoxide.

HAZARDOUS POLYMERIZATION: | May occur | X | Will not occur

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE

Use only with adequate ventilation. Do not breathe dust or spray mist. Ensure fresh air entry during application and drying. For spray application, sanding, abrading, and dust cleanup, wear an appropriate properly fitted respirator (NIOSH/MSHA TC21C approved). Follow respirator manufacturer's directions for respirator use.

Excessive inhalation of vapors can cause nasal and respirationy irritation. If affected, remove to fresh air. If breathing is difficult, administer oxygen. If breathing has stopped, give artificial respiration. Get medical attention.

SKIN AND EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE Exposure may cause mild to moderate skin irritation. Symptoms of exposure may include: drying and cracking of the skin, redness and a buring senstation. Exposure may cause severe eye irritation. Symptoms of exposure may include: tearing, redness and a stinging sensation.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE Prolonged exposure limit may result in the absorption of harmful amounts of material.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE Toxicity is low. Symptoms may include: central nervous system depression, dizziness, drowsiness, weakness, fatigue, nausea, headache, unconsciousness, kidney damage.

HEALTH HAZARDS (ACUTE AND CHRONIC)

Potential local and systemic effects due to single or short term overexposure to the eyes and skin or through inhalation or ingestion.

CARCINOGENICITY: NTP CARCINOGEN: No IARC MONOGRAPHS: Yes OSHA REGULATED: Yes This material is not listed as a human carcinogenic.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE

Overexposure of this mataerial has been suggested as a cause of the following effects in humans, and may aggravate pre-existing disorders of these organs: testis damage, male and female reproductive fertility effects.

EMERGENCY AND FIRST AID PROCEDURES

SKIN- Wash exposed area with soap and water. EYES- Flush with large amounts of water.

====== SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE =======

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED Eliminate all ignition sources (flares, flames including pilot lights and electrical sparks). Persons not wearing protective equipment should be excluded from area of spill until clean-up had been completed. Stop spill at source, dike area of spill to prevent spreading, pump liquid to salvage tank. Remaining liquid may be taken up with sand, clay, earth, floor absorbent, or other absorbent material and shoveled into containers. Prevent run-off sewers, streams, or other bodies of water.

WASTE DISPOSAL METHOD

Destroy by liquid incineration. Material collected on absorbent material may be deposited in an approved toxic substance landfill in accordance with local, state, and federal regulations.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING Store in a cool, dry area. Keep away from heat, sparks, and open flame. Keep containers closed when not in use. Use only with adequate ventilation.

OTHER PRECAUTIONS

Warning!!! Sudden release of hot organic chemical vapors or mists from process equipment operating at elevated temperatrues and pressure, or suddent ingress of air into equipment, may result in ignitions without the presence of obvious ignition sources. Any use of this product in elevated temperature processes should be thoroughly evaluated to establish and maintain safe operating conditions.

======== SECTION VIII - CONTROL MEASURES ===========

RESPIRATORY PROTECTION:

If TLV of the product or any component is exceeded, a NIOSH/MESA jointly approved self-contained breathing apparatus with a full face piece operated in pressure demand or other positive pressure mode is advised; however, OSHA regulations also permit other NIOSH/MESA respirators under specified conditions. (See your safety equipment supplier).

VENTILATION:

Provide sufficient mechanical and/or local exhaust to maintain exposure below TLV(s).

PROTECTIVE GLOVES:

Wear resistant gloves such as: BUNA-N

EYE PROTECTION:

Chemical splash goggles in compliance with OSHA regulations are advised, unless full facepiece respirator is worn.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT: N/A

WORK/HYGIENIC PRACTICES:

Wash hands thoroughly after handling this product.

This information provided as a resource only. It should not be taken as a warranty or representation for which Rodda Paint Co. assumes legal responsibility. The information contained is believed to be accurate and compiled from sources believed to be reliable, it is the responsibility of the user to investigate and verify its validity. The user assumes all responsibility of using and handling the product in accordance with applicable federal, state, and local regulations.

ATTACHMENT D WASHINGTON STATE DEPARTMENT OF ECOLOGY FORM 2

WASHINGTON STATE PEPARTMENT OF ECOLOGY

- Send To: Washington Department of Ecology Attn: DW Notifications P.O. Box 47858 Olympia, WA 985047658 (360) 407-8737

		DEPARTMENTAL USE ONLY
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	REVIEW	Ser
	. G/WAC	232000
	WA	1141 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1
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FORM 2

NOTIFICATION OF DANGEROUS WASTE ACTIVITIES

NOTE: Failure to properly and completely fill out your form may delay processing and/or cause your form to be returned for completion. Associated page number of instructions follow each section.

1. NOTIFICATION (Please	select <u>one</u> of the following choices) (p. El
1.a. New Notification	OR 1.b. Existing EPA Site ID# WA
(complete entire form	If 1.b., choose desired action below and fill in effective date.
47.6656/ 12229669	Revise Notification (complete entire form) Reactivate Site ID# (complete entire form) Effective date:
1000	Withdraw Site ID# (skip sections 9 and 10) Cancel Site ID# (skip sections 9 and 10)
2. TYPE OF BUSINESS CI	ONDUCTED AT THIS SITE: (p. 71
3) NAME OF INSTALLATI	
4 LOCATION OF INSTAL	
City or Town King	2 WA 0 98/05 State WA 20 98/05
5. INSTALLATION MAILIN	
Sertle	51370 WH Zo 98101 - 3188
6.a. INSTALLATION.CON	(First)
Job Trilo Oc.	Phone Number (206) _553 - 6709
6.b. INSTALLATION CON	TACT MAILING ADDRESS (p. 9) Same as
City	5tate Zp
7.a) INSTALLATION OW	IERSHIP (name and address of legal owner of business) (p. 8) ρ
Street or P.O. Box Sen. The	00 644 AVE ECL-116 E SUI WA 20 98101 - 3188
7.b. INSTALLATION OWN Please circle the appropriate	
	HIP (name and address of legal owner of this land) (p. 8)
Street or P.O. Box	
City	State Zp
describes the legal status of	letter to the right which Dest Tribel Trust P = Private the land on which the business is C = County Municipal
SEP 23 2003 10:23	360 407 6715 PAGE.02

8.a. EPA Site ID# (p. 0)		WA
8.6. NAME OF INSTALLATION IS 2900 NE Bla		oste
9. TYPE OF REGULATED WASTE	ACTIVITY (Mark "X" in the approp	riate boxes) (p. 8)
A. Dengerou	B Waste Activity	B. Used Oil Fuel Activities
1. Generator a. Greater than 1000 kg/mo (2,200 lbs.) b. 100 to 1000 kg/mo (220-2,200 lbs.) c. Less than 100 kg/mo (220 lbs.)	 4. Treater, Storer, Disposer (at installation) Note; A permit is required for this activity; ace instructions. 5. Dengerous Wasts Fuel a. Generator Marketing to Burner 	1. Used Oil Fuel Marketer a. Marketer Directs Shipment of Used Oil to Off-Specification Burner b. Marketer Who First Claims the Used Oil Mosts the Specifications 3. Marketer Marketer Indiana Time(s)
2. Frequency a. Monthly b. Batch c. One-time only 3. Transporter (indicate Mode in boxes	□ b. Other Merketers □ c. Boiler and/or Industrial Furnace □ 1. Smelter Deferral □ 2. Small Quantity Exemption	2. Used Oil Burner - Indicate Type(s) of Combustion Device(s) a. Utility Boiler b. Industrial Boiler c. Industrial Furnace 3. Used Oil Transporter - Indicate
1-5 below) a. For own waste only b. For commercial purposes Mode of Transportation 1. Air 2. Rail 3. Highway	Indicate Type of Combustion Devise(s) 1. Utility Boiler 2. Industrial Boiler 3. Industrial Furnece 6. Underground Injection Control 7. Immediate Recycler	Type(s) of Activity(ies) a. Transporter b. Transfer Facility 4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies) a. Process b. Re-refine
0 4. Water 5. Other - specify: 10.a. WASTE DESCRIPTIONS Ip.	8. Permit by Rule Facility 9. Trestment by Generator 12)	pounds
10.b. WASTE CODES (p. 12) Characteristics (WAC 173-3 D001 D002 D00 IGNITABLE CORROSIVE REACT	TCLP	odes that bent describe your westels).
2. Listed (WAC 173-303-9903	3 and -9904); Fill-in those codes that best	describe your westo(s).
humanamor mulanimitaliant humana	nesthered makembersisses machinessoned line	
3. State-only (WAC 173-309-1	100, -180, and -9904); Circle those code	that best describe your waste(s),
WT01 WT02 WP01 WP02 V		W001 W002 PCB RECYCLED AND CHREEZE
11. COMMENTS: (p. 13)	CARCAROCTIC	; red ; nectally animalize
Steven Menitt. 8	cology & Environmen	× (206) 624-9537
() () () () () () () () () ()	Le close up for	EPA
12. NOTIFICATION CHECKLIST		
Lif you are canceling or withdrawing	orm? # released to S. ons of this notification form to fit your situ your EPA Site ID number, you are respon tivities ended. Did you submit your comp	ation? (See Section 1-Notification) sible for annual reports up to the date
13. CERTIFICATION (p. 14)		
ettached documents, and that based information, I believe that the submitte	re personally examined and am familiar will on my inquiry of those individuals in a information is true, accurate, and compon, including the possibility of fine and imp	nmediately responsible for obtaining th lete. I em aware that there are significar
Shen Ryan for	NAME AND OFFICIAL TITLE Hype or	DATE SIGNED 9-23-03

ATTACHMENT E HAZARDOUS WASTE MANIFEST

ease print or type. (Form designed for use on elite (12-pitch) typewriter.)			Form Approve	ed. OMB no., 2050, 003
UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Mani WASTE MANIFEST NAHOOO021747 9555	ifest Document No.			n the shaded area d by Federal law.
3. Generator's Name and Mailing Address		A. State Mar	nifest Docum	ent Number
U.S. EPA REGION 10 - SHADES OF SEATTLE DUMP	SITE			
1200 6TH AVE, ECL-116 553-1263 - 24		B. State Gen	erator's ID	
4. Generator's Phone SEATTLE MA 98101 (206)553-6709			* * * * * * * * * * * * * * * * * * *	
5. Transporter 1 Company Name 6. US EPA ID) Number	C. State Tran		
BURLINGTON ENVIRONMENTAL, INC. HAROGOOGIZ	a T	D. Transport	er's Phone	253)383-3044
7. Transporter 2 Company Name 8. US EPA ID		E. State Tran	sporter's ID	
		F. Transport	er's Phone,	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
9. Designated Facility Name and Site Address 10. US EPA ID	Number	G. State Faci		
BURLINGTON ENVIRONMENTAL, INC. KENT		H. Facility's:	Phone :	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
20245 77TH AVENUE SOUTH	73 / TO	(2:		20.70
KENT, WA 98032 WAD9912817	12. Conta			1
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Num	nber) No	Type Quan	al Unit	
a: WASTE FLANKABLE LIQUIDS, N.O.S. (HETHYL ETHYL KETONE, TOLUENE)	3		Ĭs.	9001 F003 F005
RQ UM1993 P611 R9(D0C1=100) SR6(128)	2	DM 100	, [G	
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J. Additional Descriptions for Materials Listed Above. a) 321627-00 - SPENT PAINT SQLVENTS - AF01 AF02 AF03 AF04 AF05 (1)		K. Handling Co	des for Was	tes Listed Above
		C. Handling Co	des for Wasi	tes Listeu Abeve
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a) 321627-00 - SPENT PAINT SQLVENTS - AFOI AFOZ AFO3 AFO4 AFO6 (1)		K. Handling Co	des for Was	les Listed Aboye
a) 321627-00 - SPENT PAINT SQLVENTS - AFOI AFOZ AFOZ AFOZ AFOA AFOS (1)		K. Handling Co	des for Was	tes Listed Albevo
a) 321627-00 - SPENT PAINT SQLVENTS - AFOI AFOZ AFOZ AFOZ AFOZ AFOZ AFOZ AFOZ AFOZ				tes Listed Albevo
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RESOURCE RECOVERY 1629 East Alexander Ave., Tacoma WA 98421 (253) 383-3044
DEI PUGET SOUND 1629 East Alexander Ave., Tacoma WA 98421 (253) 383-3044

BILL OF LADING

LTL

							
9/29/03	BEGINNING MILEA		~	ON DUTY	<u>/^)</u>	7.3-	(ÁM) PM
DRIVER NAME	ENDING MILEAGE	<u> 7309</u>	/	OFF DUTY			AM
Jim A Rouse		73/23	 1				AM PM
VEHICLE NO.	TRAILER NO.	BOX NO.		ST CENTER .	SHIPPERS	NO.	ORDER NO.
107				7000_	9555	56	627528
SHIPPER / ORIGIN 496 44	,	WEIGH INFORM	IATION	1			
NAME SAACLES OF SE	11/1/2	GROSS			1	R OFFICE U	SE ONLY
ADDRESS 2900 N.E. BLAK.	1045T.	TARE			CONTAINER	RATE	FREIGHT
CITY SCATTLE STATE C	MAZIP 78/05	NET					
QUANTITY	DOT PROPER SHIPPIN	G NAME					
Zom le	MANIL	57A					
	95556	·					
					PLEASE PAY THIS AMOUNT	→	
This is to certify that the above named materials marked and labeled, and are in proper condition regulations of the Department of Transportation.	for transportation, acco	described, packaged ording to the applicable of	е	13 .		٠.	
DESTI	NATION						
NAME BESS	, <u></u>	EIPT#					8108 (206) 762-3362
ADDRESS 20295 // /4	حی مربر						98421 (253) 627-7568
CITY KENT	STATE WA		_کے ا	WASHOUGAL (360) 835-85		(P.O. Box 229) Washougal, WA 98671
VEHICLE NO. 102 TRAILER	NO	DATE 9/25/12	ا خی	• •	th Ave. S., Kent, WA	A 98032 (253)	872-7859
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FINISH: AM	HRS. CHARGEA	ABLE FINISH:			AM PM	НВ	S. CHARGEABLE
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SIGNATURE FOR DELAY:		SIGNATUI		, DELAY:	<u> </u>		
DRIVER SIGNATURE	o/www	2					
COMMENTS:							
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Burlington Environmental Inc., a wholly owned subsidiary of PHILIP SERVICES CORP., RCRA Land Disposal Restriction Notification Form EZ

Generator: US	S EPA Region 10/ Shade	es of Seattle Universi	ty Dump Site	U.S. EPA I.D. #:_	WAH000021747
Profile #:	321627-00		_	Manifest #:	95556
standards spe		part D or do not m	eet the applicable	prohibition levels s	68. The wastes do not meet the treatmespecified in 268.32. Pursuant to 40 Clat apply):
	Treatability (Wastewaters	Group: contain less than 1%	☐ Wastewater filterable solids a		nwastewater l Organic Carbon)
Con Con	mplete form UC, unless nitable (except for High gh TOC Ignitable (great prosive managed in Ownersive managed in CW eactive Sulfides based or eactive Cyanides based of ater Reactives based of (Complete form UC)	5 D001 is the only "D TOC) managed in CV for than 10% total org on-CWA/non-CWA- A/ CWA-equivalent/ of 261.23(a)(5) on 261.23(a)(5) on 261.23(a)(2),(3) and of 261.23(a)(2),(3)	" code and the wa WA/ CWA-equiva anic carbon) equivalent/non C Class I SDWA sys d (4) managed in (4) managed in CV	ste is to be combusti- lent/Class I SDWA s lass I SDWA system stems	systems
	oxes are checked, comple WA/CWA-equivalent/Cl			erlying hazardous co	onstituents (unless these wastes are to be
D009 Hig D009 Lo D010 Sel D012 Er D013 Li D014 M D015 To D016 2,4 D017 2,5 D018 Be D019 C2 D020 Ci D021 Ct D022 Ct D	nromium D00 gh mercury inorganic (>2) gh-mercury organic (>2) w-mercury (<260 mg/k lenium indane lethoxychlor oxaphene 4-D 4,5-TP (Silvex) enzene arbon tetrachloride hlorobenzene hloroform	60 mg/kg total), not in kg total) D011 Silver D023 o-Creso D024 m-Creso D025 p-Creso D026 Cresols D027 p-Dichle D028 1,2-Dichle D030 2,4-Dini D031 Heptach	ncluding incinerat D009 All D0 I ol (Total) orobenzene nloroethane nloroethylene itrotoluene nlor	D033 Hexact D034 Hexact D035 Methy D036 Nitrob D038 Pyridit D039 Tetract D041 2,4,5-1 D042 2,4,6-1 D043 Vinyl of	hlorobutadiene hloroethane l ethyl ketone enzene thlorophenol ne hloroethylene oroethylene frichlorophenol crichlorophenol chloride
Note: If any materi	bolded entries are che ial is treated in a Clear	cked, form UC must 1 Water Act (CWA)	be completed to treatment proces	address underlying is or unless otherwis	, hazardous constituents, unless the se noted above.
▼ F001-F00	e following wastes are in 05 spent solvents. (If this s) that applies, and ident	s box is checked, com	plete the F001-F0	05 section on the bac in the waste.)	ck of this form. Check the hazardous wa
If this shipme	ent carries additional was a Subcate	vaste codes that are regory (if applicable		ove, identify them h	Subcategory (if applicable)

This is a two sided form

F001-F005 Spent Solvents Check the box(es) that applies; identify th	e individual constituents likely i	to be present.
Hazardous waste description	Regulated hazardous constit	uents
F001 Spent halogenated solvents used in degreasing	Carbon tetrachloride Tetrachloroethylene Trichloroethylene Trichloromonofluoromethane	Methylene chloride 1,1,1-Trichloroethane 1,1,2-Trichloro-1,2,2-trifluoroethane
F002 Spent halogenated solvents	Chlorobenzene Methylene chloride 1,1,1-Trichloroethane Trichloroethylene Trichloromonofluoromethane	o-Dichlorobenzene Tetrachloroethylene 1,1,2-Trichloroethane 1,1,2-Trichloro-1,2,2-trifluoroethane
F003 Spent non-halogenated solvents	Acetone Cyclohexanone* Ethyl benzene Methanol* Xylenes (total)	n-Butyl alcohol Ethyl acetate Ethyl ether Methyl isobutyl ketone
☐ F004 Spent non-halogenated solvents	m-Cresol p-Cresol Nitrobenzene	o-Cresol Cresol-mixed isomers (cresylic acid)
	Benzene 2-Ethoxyethanol Methyl ethyl ketone Pyridine	Carbon disulfide* Isobutyl alcohol 2-Nitropropane Toluene
	two, or all three of these constituen	wastewaters are based on the TCLP and apply to spent its. The treatment standards for these three constituents iste.
	hat will be treated to comply with t	the alternative treatment standards of 268.45 (e.g.,
		2.2. Per 268.45, hazardous debris must be treated up the waste code in 268.40 and list the regulated
The contaminants subject to treatment for this	debris are identified below:	
EPA Waste Code Subcategory	Contaminants subject	to treatment

CERTIFICATE OF TREATMENT, RECYCLING, AND/OR DISPOSAL

This is to certify that the following waste material was received, managed, and treated in compliance with all applicable Federal and Washington State Laws and regulations.

Facility : BURLINGTON ENVIRONMENTAL, INC.

20245 77TH AVENUE SOUTH

KENT FACILITY

: WAD991281767

KENT WA, 98032

Generator: 49644 - SHADES OF SEATTLE -

EPA ID : WAH000021747

Manifest # 95556-03

EPA ID

Waste Receipt # KNT-21789

Date Received: 09/30/2003

Line Profile	Material Description	Treatment/ Disposal Description	Final Treatment/ Disposal Facility	Final PSC Manifest	Final Date/ PgLn Shipped
1A 321627-00	WASTE FLAMMABLE LIQUIDS, N.O.S. (METHYL ETHYL KETONE, TOLUENE)	H050 ENERGY RECOVERY AT THIS SITE - USE AS FUEL (INC. FUEL BLENDING)	ASH GROVE CEMENT	18313-TAC	1A 10/23/2003
			ASH GROVE CEMENT	18331-TAC	1A 11/04/2003
		H061 FUEL BLENDING PRIOR TO ENERGY RECOVERY AT ANOTHER SITE	CONTINENTAL CEMENT CO. L.L.C	23538-KNT	1A 11/14/2003
		H050 ENERGY RECOVERY AT THIS SITE - USE AS FUEL (INC. FUEL BLENDING)	ASH GROVE CEMENT	18347-TAC	1A 11/19/2003
			ASH GROVE CEMENT	18358-TAC	1A 11/25/2003
			ASH GROVE CEMENT	18363-TAC	1A 12/04/2003
,			ASH GROVE CEMENT	18383-TAC	1A 12/11/2003
			ASH GROVE FOREMAN	18400-TAC	1A 12/18/2003
		ASH GROVE FOREMAN	18412-TAC	1A 12/30/2003	

Name: Cathy Weedin

Title: Senior Tracking Specialist